

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE

FUSION ELITE ALL STARS et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC et al.,

Defendants.

**Civ. Action No. 2:20-cv-2600**

**DECLARATION OF WILLIAM SEELY**

I, William (Bill) Seely, based on personal knowledge, declare as follows:

1. I have served in various leadership roles at Varsity Spirit, LLC for 30 years. My current position is President of Varsity Spirit, which I have held for more than three years.

Previously, I served as Senior Vice President and, then, Executive Vice President of the organization.

2. Due to the Covid-19 pandemic and its impact on Varsity's All Star cheerleading and other businesses, Varsity faces severe financial hardship.

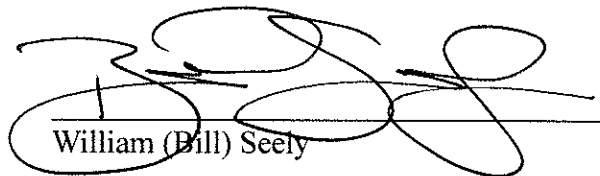
3. Jamie Parrish formerly reported directly to Nicole Lauchaire, who currently serves as Varsity' Senior Vice President of Corporate Communications and previously served as Varsity's Senior Vice President of Corporate Marketing and Communications.

4. James Hill formerly reported directly to Brian Elza, who served as Varsity's Vice President and Co-General Manager of All Star.

5. Neither Jamie Parrish nor James Hill were specifically involved in Varsity's high-level decision making related to Varsity's acquisitions, rebate programs, or relationship with USASF. They were lower-level employees who worked under their aforementioned supervisors.

I would expect that, to the extent any significant documents or communications relating to those issues were in the files of Mr. Parrish or Mr. Hill, they would likewise be in the files of their supervisors or other current or former senior employees of Varsity, including myself, John Nichols, Jeff Webb, Tres Letard, Pash Nangia, Brian Carroll and/or John Newby.

6. I declare under penalty of perjury that the foregoing is true and correct. Executed on May 19, 2021.



William (Bill) Seely